UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

RAJU MEGANATHAN, et al., *Plaintiffs*	*	
v.	*	Civil Action No. 1:13-cv-00497-MAC-ZJH
SIGNAL INTERNATIONAL, L.L.C., et al., *Defendants*	*	

STATUS REPORT

Plaintiffs and Signal International, LLC, and certain of its affiliates (the "Signal Entities"), in accordance with the Court's Order Staying Case Pursuant to Bankruptcy [Dkt. No. 335] requiring the parties to file a notice informing the Court of the status of the Signal bankruptcy proceedings, hereby file this Status Report as of November 8, 2016.

As noted in Plaintiffs' and the Signal Entities' prior notice, the Signal Entities filed voluntary petitions for relief under Chapter 11 of Title 11 of the United States Code on July 12, 2015. *In re Signal Int'l, Inc, et al.*, No. 15-11498 (Bankr. D. Del. July 12, 2015).[1] Prior to the Signal Entities' bankruptcy filings, the Plaintiffs, the Signal Entities, and certain other civil plaintiffs entered into a certain plan support agreement (the "PSA"), which contemplates, among other things, a settlement of the Plaintiffs' claims against the Signal Entities through a consensual chapter 11 plan proposed by the Signal Entities. On November 24, 2015, the Bankruptcy Court entered its Findings of Fact, Conclusions of Law and Order Confirming

[1] The other entities are: *Signal Ship Repair, LLC* (Case No. 15-11499), *Signal Int'l, LLC* (Case No. 15-11500), *Signal Int'l Texas GP, LLC* (Case No. 15-11501), and *Signal Int'l Texas, L.P.* (Case No. 15-11502). By the bankruptcy court's order, all five cases are being jointly administered with the *Signal Int'l, Inc.* case. *In re Signal Int'l, Inc.*, No. 15-11498 (Bankr. D. Del. July 14, 2015), ECF No. 55.

Debtors' First Amended Joint Plan of Liquidation Pursuant to Chapter 11 of the Bankruptcy Code [ECF No. 555] (the "Confirmation Order"), confirming the Signal Entities' plan of liquidation, which implemented the plan support agreement among the Plaintiffs, the Signal Entities and certain other parties, for the settlement of, *inter alia*, the Plaintiffs' claims against the relevant Signal Entities. Pursuant to the Plan, a litigation trust (the "Signal Litigation Trust") has been created for the distribution of the settlement proceeds. That process remains ongoing, as the Signal Litigation Trust distributed Trust Claim Forms in February and the Plaintiffs have submitted their claim forms.

The Plan became effective on December 14, 2015. As of that date, pursuant to the Confirmation Order, "any suit, legal action, or other proceeding … in any forum in the United States that is released, stayed, or enjoined pursuant to Article XI of the Plan against or affecting any Released Party [the Signal Entities], shall be stayed, enjoined or otherwise prohibited from continuation as to any Released Party." (Confirmation Order at 25.)

In light of Signal Entities' ongoing bankruptcy cases, Plaintiffs respectfully request that the stay remain in effect. This report has been approved by counsel for all parties. The parties will file a further status update in 120 days.

Respectfully submitted, this 8th day of November, 2016.

Respectfully submitted, this 8th day of November, 2016.

/s/ Timothy H. Birnbaum Timothy H. Birnbaum (*pro hac vice*) Michael D. Hynes (*pro hac vice*) **DLA PIPER LLP (US)** 1251 Avenue of the Americas New York, New York 10020-1104 Telephone: (212) 335-4618 Facsimile: (917) 778-8618 timothy.birnbaum@dlapiper.com michael.hynes@dlapiper.com ***ATTORNEYS FOR PLAINTIFFS***	*/s/ Erin Casey Hangartner (w/exp. permission)* Erin Casey Hangartner (La. Bar No. 24768) Alan Dean Weinberger (La. Bar No. 13331) Elham R. Rabbani (La. Bar No. 33322) Brian C. Roux (La. Bar No. 35298) Lance R. Rydberg (La. Bar No. 02089) Mitchell P. Hasenkampf (La. Ba No. 32870) Robert L. Keller III (La. Bar No. 35188) Lauren Masur Davis (La. Bar No. 34669) **HANGARTNER RYDBERG & TERRELL, LLC** 701 Poydras Street, Suite 310 New Orleans, Louisiana 70139 Telephone: (504) 522-5690 Facsimile: (504) 522-5689 ehangartner@hanrylaw.com aweinberger@hanrylaw.com erabbani@hanrylaw.com broux@hanrylaw.com lrydberg@hanrylaw.com mhasenkampf@hanrylaw.com rkeller@hanrylaw.com lmasur@hanrylaw.com and Patricia A. Bollman (La. Bar No. 17563) James L. Cornblatt (*pro hac vice*) **PATRICIA A. BOLLMAN,** **A PROFESSIONAL LAW CORPORATION** 3636 S. I-10 Service Road W., Suite 200 Metairie, Louisiana 70001 Telephone: (504) 218-5887 Facsimile: (504) 304-0890 patricia@bollmanfirm.com cornblatt25@gmail.com ***ATTORNEYS FOR DEFENDANTS SIGNAL INTERNATIONAL, L.L.C., SIGNAL INTERNATIONAL, INC., SIGNAL INTERNATIONAL TEXAS, G.P., and SIGNAL INTERNATIONAL TEXAS, L.P.***

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CERTIFICATE OF SERVICE

I hereby certify that on November 8, 2016, I electronically filed the foregoing **Status Report** with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to all ECF participants.

I further certify that on November 8, 2016, I served a true and correct copy of the foregoing document upon the below-named Defendants by depositing a copy of same in the U.S. Mail, with sufficient postage thereon to insure delivery, and properly addressed as follows:

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